

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOSEPHINE HOOD,)	
)	
Plaintiff,)	Case No. 15-cv-06274
)	
v.)	Hon. Elaine E. Bucklo
)	
BASS AND ASSOCIATES, P.C.,)	
)	
Defendant.)	

**UNCONTESTED MOTION OF DEFENDANT, BASS AND ASSOCIATES, P.C.,
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant, BASS AND ASSOCIATES, P.C. (“Bass”), by its attorneys, David J. Frankel, Esq. and the law firm of Sorman & Frankel, Ltd., respectfully requests this Court, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Fed. R. Civ. P. 6(b) (West 2015), and such other Rules as may apply, to enter an Order granting Santander an extension of time to answer or otherwise plead in response to Plaintiff’s, JOSEPHINE HOOD (“Plaintiff”), Complaint (the “Complaint”). In support thereof, Santander states as follows:

1. Plaintiff, upon information and belief, filed her Complaint on or about July 17, 2015.
2. Bass has retained the undersigned counsel to represent it in this matter and said counsel respectfully requests this Court to grant it additional time to investigate the facts of this matter to determine Bass’ proper response, whether it be an answer or motion to dismiss the Complaint, and whether additional pleadings may be required.

3. Accordingly, Bass respectfully request this Court to enter an Order granting it an additional twenty-eight (28) days in which to answer or otherwise plead in response to the Complaint. This Motion is Bass' first request of this nature.

4. This motion is not brought for any improper purpose, and granting Bass the relief requested in this Motion will cause neither undue delay to these proceedings nor prejudice to Plaintiff. To the contrary, one of Bass' in-house counsel, Jason L. Erwin, Esq., has been in communication with one of Plaintiff's counsel, Mohammed Omar Badwan, Esq., regarding the relief sought in this motion and Mr. Badwan has advised that he has no objection to same.

WHEREFORE, Defendant, BASS AND ASSOCIATES, P.C., respectfully requests this Court to enter an Order granting it an additional twenty-eight (28) days to answer or otherwise plead in response to Plaintiff's Complaint; and, for such other, further and different relief as this Court deems just and proper.

Dated: August 18, 2015.

Respectfully submitted,

BASS AND ASSOCIATES, P.C.,
Defendant,

By: /s/ David J. Frankel
One of its attorneys

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